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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products
16 Liability Litigation

17 No. MD-15-02641-PHX-DGC

18 **JOINT MOTION TO EXTEND
19 DEADLINES FOR EXPERT REPORTS
20 REGARDING PLAINTIFF TINLIN
21 PURSUANT TO CMO 39**

22 (Assigned to the Honorable David G.
23 Campbell

24 The parties, by and through their respective undersigned counsel, hereby submit
25 this Joint Motion to Extend Deadlines for Expert Reports regarding Plaintiff Tinlin.

26 The parties stipulate to extend the deadlines set forth in Case Management Order
27 39 (Doc. 12971) regarding the disclosure of case specific expert reports. Pursuant to this
28 stipulation, the deadline for Plaintiff's case specific expert report disclosure would be
December 4, 2018. The deadline for Defendant's case specific expert report disclosure
would be January 4, 2019.

29 RESPECTFULLY SUBMITTED this 16th day of November 2018.

30 BEUS GILBERT PLLC

31 By:/s/ Ramon Rossi Loepz
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Marilyn B. Wass